

**UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH,  
Individually and as Parent and Legal  
Guardian of W.W., K.W., G.W., and  
L.W., minor children, and  
MATTHEW WADSWORTH,

Plaintiffs,

v.

WALMART, INC. and JETSON  
ELECTRIC BIKES, LLC,

Defendants.

Case No.: 2:23-cv-00118-NDF

JURY TRIAL DEMANDED

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**PLAINTIFFS' DISCLOSURE STATEMENT PURSUANT TO  
FEDERAL RULE OF CIVIL PROCEDURE 7.1**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, Plaintiffs Stephanie Wadsworth, W.W., K.W., G.W., L.W., and Matthew Wadsworth make the following disclosure(s).

1. If the filer is a nongovernmental corporate party or a nongovernmental corporation that seeks to intervene, identify any parent corporation and any publicly held corporation owning 10% or more of its stock or state there is no such corporation:

There is no such corporation.

2. If this is an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), name and identify the citizenship of every individual or entity whose citizenship is attributed to the filing party or intervenor: [To identify the citizenship of a partnership, LLC, or other unincorporated entity, a party must list the citizenships of all members or partners of that entity.<sup>1</sup>]

1. Stephanie Wadsworth – Sweetwater County, WY
  2. Matthew Wadsworth – Sweetwater County, WY
  3. W.W. (Minor Child) – Sweetwater County, WY
  4. K.W. (Minor Child) – Sweetwater County, WY
  5. G.W. (Minor Child) – Sweetwater County, WY
  6. L.W. (Minor Child) – Sweetwater County, WY
3. Identify each person—including each lawyer, association, firm, partnership, corporation, limited liability company, subsidiary, conglomerate, affiliate, member, and other identifiable and related legal entity—that has or might have an interest in the outcome:
1. Stephanie Wadsworth
  2. Matthew Wadsworth
  3. W.W. (Minor Child)
  4. K.W. (Minor Child)
  5. G.W. (Minor Child)
  6. L.W. (Minor Child)
  7. Walmart, Inc.
  8. Jetson Electric Bikes
  9. Morgan & Morgan, P.A.
    - a. T. Michael Morgan - Counsel for Plaintiff (Pro Hac Vice)
    - b. Eitan Goldrosen - Counsel for Plaintiff (Pro Hac Vice)
  10. Goody Law Group
    - a. Taly Goody - Counsel for Plaintiff

b. Greyson Goody - Counsel for Plaintiff (Pro Hac Vice Pending)

11. Sundahl Powers Kapp & Martin

a. John A. Sundahl - Counsel for Defendant Walmart, Inc.

b. Patrick Michael Brady - Counsel for Defendant Walmart, Inc.

12. Crowley Fleck PLLP

a. Timothy Michael Stubson - Counsel for Defendant Jetson Electric Bikes, LLC

b. Brandon E. Pryde - Counsel for Defendant Jetson Electric Bikes, LLC

4. Identify each entity with publicly traded shares or debt potentially affected by the outcome:

Plaintiff is not aware of any such entity.

5. Identify each additional entity likely to actively participate, including in a bankruptcy proceeding the debtor and each member of the creditors' committee:

Plaintiff is not aware of any such entity.

6. Identify each person arguably eligible for restitution:

1. Stephanie Wadsworth

2. Matthew Wadsworth

3. W.W. (Minor Child)

4. K.W. (Minor Child)

5. G.W. (Minor Child)

6. L.W. (Minor Child)

  X   I certify that, except as disclosed, I am unaware of an actual or potential conflict of interest affecting the district judge or the magistrate judge in this action, and

I will immediately notify the judge in writing within fourteen days after I know of a conflict.

Date: August 16, 2023

Respectfully Submitted,

/s/ Eitan Goldrosen\*

**Eitan Goldrosen, Esq.**

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*\*Pro Hac Vice*

*\*\* Pro Hac Vice Pending*

*Counsel for the Plaintiffs*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on August 16, 2023, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Eitan Goldrosen

Eitan Goldrosen